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September 7, 2021

BY ECF ONLY

Hon. Jesse M. Furman, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Centre Street
New York, New York 10007

Application GRANTED. The initial pretrial conference currently scheduled for September 14, 2021, is ADJOURNED to September 27, 2021, at 3:45 p.m. The parties shall file their joint letter and proposed Case Management Plan by September 23, 2021. See ECF Nos. 4, 14. The Clerk of Court is directed to terminate ECF No. 15.

SO ORDERED.



Dear Judge Furman:

September 9, 2021

I am writing this letter-motion to request an adjournment of the original date for initial pretrial conference scheduled for September 14, 2021 as well as the submission of the proposed case management plan and joint letter. Our firm is currently counsel for plaintiff Jacqueline Garcia.

We would like to request 2 (two) week adjournment and extension for all to September 28, 2021. There have been no previous requests for adjournment or extension. I have spoken with incoming defendant attorney for all defendants Susan Owens, Esq., from the Law Office of James Toomey and incoming plaintiff attorney Peter Vakarev, Esq. and they have both consented to the adjournment. I was just notified today of the substitution of defendant attorney by Nick Migliaccio, Esq. from Law Office of Thomas K. Moore who consents and instructed by him to contact incoming defendant attorney Susan Owens, Esq. From the Law Office of James Toomey who will be representing all defendants. Additionally, I have just been informed by Peter Vakarev, Esq. that his office will be incoming attorney for plaintiff Jacqueline Garcia. This will allow incoming counsel for all defendants and plaintiff sufficient time to do the following including but not limited to orderly transfer of files, consents to change and file notices of appearances. The next scheduled appearance before the Court is the original date for initial pretrial conference scheduled for September 14, 2021.

Very truly yours,



Eric Horn (EH 9520)

cc: By ECF Only
Nick Migliaccio, Esq.